

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

BOARD OF TRUSTEES OF THE LOCAL )
UNION NO. 422 U.A. OF JOLIET, )
ILLINOIS PENSION FUND AND )
BOARD OF TRUSTEES OF THE LOCAL )
UNION NO. 422 U.A. OF JOLIET, ) No. 08 C 4472
ILLINOIS WELFARE FUND, )
) Judge Der-Yeghiayan
Plaintiffs, )
) Magistrate Judge Keys
v. )
)
NAAL PLUMBING AND HEATING )
CO., an Illinois corporation, )
)
Defendant. )

MOTION FOR ORDER OF DEFAULT AND JUDGMENT IN SUM CERTAIN

Plaintiffs, by one of their attorneys, DONALD D. SCHWARTZ and ARNOLD AND
KADJAN, pursuant to F.R.C.P. 55, respectfully request this Honorable Court to enter an Order
of Default as to liability and Judgment in favor of Plaintiffs and against Defendant, NAAL
PLUMBING AND HEATING CO..

In support thereof, Plaintiffs state:

- 1. This case was filed on August 7, 2008.
2. Defendant was served with Summons and Complaint on August 13, 2008.

(Exhibit A.)

3. In excess of 20 days have expired since Service of Process, however, Defendant
has failed to file an answer or otherwise plead.

4. Per the affidavit of Gary Blankenship, Defendant owes for reports from December
27, 2007 through July 31, 2008 for \$108,273.78 and \$10,827.37 liquidated damages for a total
due of \$119,101.15. (Exhibit A)

5. Per the affidavit of Donald Schwartz, attorney for Plaintiffs in legal fees and expenses \$1,300.00 has been incurred in this suit. (Exhibit B)

**WHEREFORE**, Plaintiffs pray for:

1. An Order of Default against the Defendant.
2. Judgment be rendered in the amount of \$120,401.15.

Respectfully submitted,

BOARD OF TRUSTEES OF THE LOCAL  
UNION NO. 422, U.A. OF JOLIET, ILLINOIS  
PENSION FUND, et. al.

s/ Donald D. Schwartz  
Counsel for Plaintiffs

Donald D. Schwartz  
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